

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JFK)

(Jointly Administered)

**LIBBY CLAIMANTS' OBJECTION TO EXHIBITS IDENTIFIED BY PLAN
PROPONENTS, CNA, MCC, BNSF, AND STATE OF MONTANA**

The Libby Claimants object to the exhibits identified by the Plan Proponents, CNA, MCC, BNSF, and State of Montana on the bases set forth in Exhibit "A" attached hereto. At this point, the purpose for which many of the exhibits will be offered and the context in which many of the exhibits will be offered are not clear. Additionally, the Libby Claimants have never seen many of the exhibits, which have not yet been produced to them. The Libby Claimants therefore reserve the right to assert additional objections and to join in any objections to the exhibits introduced by any party during the confirmation hearing. While the Libby Claimants endeavored to specify all of their objections, the massive number of exhibits and limited time to object prevented a comprehensive review of the documents.

Dated: September 1, 2009
Wilmington, Delaware

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